<u>REMARKS</u>

Upon entry of the present amendments, claims 1-21 and 23-34, and 36-53, and 55-91 will be pending in the subject application. Claims 1, 2, 6-9, 17-24, 30-37, 43, 51-53, 79, and 82 have been amended, claims 10-16, 25-29, 38-42, 44-50, and 55-78 have been withdrawn, new claims 83-91 have been added, and claims 22, 35, and 54 have been cancelled as shown on pages 2-15 of the Reply. No new matter has been added.

Applicants' representative thanks Examiner Pham for the courtesies extended during the telephonic interview conducted on January 3, 2012, during which a set of proposed claim amendments were discussed. The Examiner offered general recommendations for amendments that he believed would more clearly distinguish the present claims from the cited references. The Examiner's recommendations have been incorporated in the claims presented herein.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I.   <u>Rejection of Claims 1-9, 17-24, 30-37, 43, 51-54, and 79-82 Under 35 U.S.C §103</u>

Claims 1-9, 17-24, 30-37, 43, 51-54, and 79-82 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Farrell, *et al.* (US 7,717,841) in view of Yaksich, *et al.* (US 5,563,999). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Farrell, *et al.* and Yaksich, *et al.*, individually or in combination, do not disclose or suggest all elements set forth in the subject claims.

> To reject claims in an application under § 103, an examiner must establish a prima facie case of obviousness. A prima facie case of obviousness is established by a showing of three basic criteria. First, there must be some apparent reason to combine the known elements in the fashion claimed by the patent at issue (*e.g.*, in the references themselves, interrelated teachings of multiple patents, the effects of demands known to the design community or present in the marketplace, or in the knowledge generally available to one of ordinary skill in the art). To facilitate review, this analysis should be made explicit. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP § 706.02(j). See also KSR Int'l Co. v. Teleflex, Inc., 550 U.S. 398, 04-1350, slip op. at 14 (2007). The reasonable expectation of success must be found in the prior art and not based on applicant's disclosure. See In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)

Amended independent claim 1 recites, *a processor configured to receive first input that selects a sales packet to be printed and second input that **selects an event, from a menu of events relating to activity in a sales management database, that indicates at least one of addition of a new sales contact or a change of status of an existing sales contact**; and storage configured to store an event rule that relates the event and the sales packet, wherein the processor is configured to **generate a print order for the sales packet in response to occurrence of the event***.

Farrell, *et al.* does not disclose or suggest at least these aspects. Farrell, *et al.* relates to a job processing method that allows an operator of an electronic reprographic system to select deferred actions for inactive print jobs which are automatically initiated upon the detection of a specific triggering event (see Farrell, *et al.*, Abstract). Farrell, *et al.*'s system includes a means for storing an inactive print job, means for entering a job processing instruction or set of instructions associated with the inactive print job for use at a future time, and means for automatically triggering access of the inactive print job and the job processing instructions associated with the inactive print job. According to Farrell, *et al.*, the triggering means is typically one a predetermined set of system operating conditions (see Farrell, *et al.*, column 2, lines 45-60).

However, Farrell, *et al.* is silent with regard to a processor configured to receive input that *selects an event, from a menu of events relating to activity in a sales management database, that indicates at least one of addition of a new sales contact or a change of status of an existing sales contact*, or that *generates a print order for a sales packet in response to occurrence of the event*. In this regard, the Office Action indicates in particular the aforementioned trigger events, described at columns 6-10 of Farrell, *et al.* However, describing these triggering events at column 6, lines 45-54, Farrell, *et al.* states:

> "When these triggering events occur, the automatic action specified by the
> operator will be performed. Some examples of triggering events include, for
> example: *date and time (specified in relative or absolute terms); resource
> availability (i.e., availability of resources such as, for example, print queues,
> cartridge tape drives, modems, file servers, finishing devices, fonts, etc.);
> operator logoff; operator logon; receipt or creation of a specified second print*

job; system transition to a quiescent state; etc." (emphasis added)

These indicated triggering events do not relate to *an event, from a menu of events relating to activity in a sales management database, that indicates at least one of addition of a new sales contact or a change of status of an existing sales contact*, and indeed Farrell, *et al.* does not contemplate using such an event to *generate a print order*.

Moreover, Farrell, *et al.* is silent with regard to *generating a print order for a sales packet* in response to occurrence of the aforementioned event. With regard to generation of a print order, the Office Action notes that Farrell, *et al.* generates and prints *inactive print jobs* in response to a triggering event, as illustrated at FIGs. 5b and 9-12 of the cited reference. However, column 4, line 59 – column 5, line 7 of Farrell, *et al.* describes the inactive print jobs as follows:

"The *scanned image data input from processor 25 of scanner section 6* to controller section 7 is compressed by image compressor/processor 51 of image output input controller 50 on printed wiring board (PWB) 70-3…The compressed image data together with slice pointers and any related image descriptors providing image specific information (such as height and width of the document in pixels, the compression method used, pointers to the compressed image data, and pointers to the image slice pointers) are placed in an image file. *The image files, which represent different print jobs*, are temporarily stored in the system memory 61, which comprises a RAM, pending transfer into memory 56 where the data is held pending use." (Farrell, *et al.*, column 4, line 59 – column 5, line 7) (emphasis added)

As evidenced at least at the above passage, Farrell, *et al.*'s deferred print jobs do not represent *a print order for a sales packet*, but rather are *pending print jobs for scanned image data*.

In view of these numerous deficiencies, it is respectfully submitted that Farrell, *et al.* does not disclose or suggest *a processor configured to receive first input that **selects a sales packet to be printed** and second input that **selects an event, from a menu of events relating to***

activity in a sales management database, that indicates at least one of addition of a new sales
contact or a change of status of an existing sales contact; and storage configured to store an
event rule that relates the event and the sales packet, wherein the processor is configured to
generate a print order for the sales packet in response to occurrence of the event.

  Yaksich, *et al.* is also silent regarding at least these aspects. Yaksich, *et al.* relates to a
forms automation system in which a central library facility functions as a central repository for
business forms in electronic format. According to Yaksich, *et al.*, these forms are distributed to
specified use locations by the central library depending upon the needs of the various use
locations (see Yaksich, *et al.*, Abstract).

  Asserting that Yaksich, *et al.* discloses generating a print order in response to an event
relating to activity in a sales management database, the Office Action notes in particular the
above-mentioned distribution of forms to specified use locations, as described at various sections
of Yaksich, *et al.* Ostensibly, the Examiner equates Yaksich, *et al.*'s distribution of business
forms with generation of a print order as set forth in independent claim 1. However, with regard
to criteria for distributing these forms, the cited reference states only that the indicated business
forms are distributed "though automatic scheduling or in response to commands input at the
centralized location" (see, *e.g.*, Yaksich, *et al.*, column 2, lines 50-55). Additionally, column 3,
lines 33-41 of Yaksich, *et al.* recites the following steps for distributing the business forms:

> "…(a) storing in electronic format in a computer a plurality of different business
> forms; (b) also storing in the computer predefined commands, including date and
> extent of distribution commands, relating to the distribution of the electronic
> business forms; (c) *periodically polling the computer to locate applicable date*
> *commands*; and (d) *in response to applicable date commands located in step (c),*
> *automatically distributing the electronic business forms* to those of the plurality of
> end users specified by the distribution comments." (Yaksich, et al, column 3, lines
> 33-41) (emphasis added)

  Yaksich, *et al.* nowhere discloses or suggests receiving second input that *selects an event,*
from a menu of events relating to activity in a sales management database, that indicates at least
one of addition of a new sales contact or a change of status of an existing sales contact, or

generating a print order for a sales packet in response to occurrence of the event.

Similarly, amended independent claim 7 recites, *selecting, via a second display region, an event relating to a change in the sales management database indicative of at least one of addition of a new sales contact or a change in status of an existing sales contact; and generating a print order for the sales packet in response to detecting occurrence of the event.* As discussed *supra,* Farrell, *et al.* and Yaksich, *et al.* are silent regarding at least these aspects.

Likewise, amended independent claim 9 recites, *a second display region configured to display a menu of events for occurrence in a sales management database, wherein **the events respectively relate to at least one of addition of a new sales contact or a change of status of an existing sales contact**, and in **response to occurrence of an event selected from the menu of events, a print order for the sales packet is generated**,* amended independent claim 17 recites, *displaying a set of events relating to respective changes in a sales management database, **the respective changes indicative of to at least one of addition of a new sales contact or a change of status of an existing sales contact**…and **generating a print order for the sales brochure in response to detecting the occurrence of the event**,* amended independent claim 30 recites, *displaying a set of events that define respective changes in a sales management database, the respective changes indicating at least one of addition of a new sales contact or a change of status of an existing contact…and generating a print order for the subset of the sales materials in response to the occurrence of the event,* and amended independent claim 43 recites, *a display having a first display region configured to display a sales brochure to be printed and a second display region configured to display a menu of events associated with respective changes in a sales management database, **the respective changes indicative of at least one of a new sales contact added to the sales management database or a change of status of an existing sales contact**…wherein the processor is further configured to, **in response to performance of the event, generate a print order for the sales brochure**.* The cited references fail to disclose or suggest at least these aspects, as discussed above.

Also, amended claim 6 recites, *the first input selects the sales packet from a list of available sales packets having respective different versions.* Neither Farrell, *et al.* nor Yaksich, *et al.* disclose or suggest making such a selection.

In view of at least the foregoing, it is respectfully submitted that Farrell, *et al.* and Yaksich, *et al.*, individually or in combination, do not disclose or suggest all aspects of amended independent

claims 1, 7, 9, 17, 30, and 43 (and all claims depending there from), and as such fail to render obvious the present application. It is therefore requested that this rejection be withdrawn.

<p style="text-align:center">CONCLUSION</p>

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [VIMGP111US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

TUROCY & WATSON, LLP

  /Brian Steed/
Brian Steed
Reg. No. 64,095

TUROCY & WATSON, LLP
127 Public Square
57th Floor, Key Tower
Cleveland, Ohio 44114
Telephone (216) 696-8730
Facsimile (216) 696-8731